

April 15, 2011

Mr. Tom Gainer
Oregon Department of Environmental Quality
2020 SW Fourth Avenue, Suite 400
Portland, OR 97201-4987

**Subject: Upland Feasibility Study, January 25, 2011
Terminal 4 Slip 1 Upland Facility (ECSI No. 2365)
Response to DEQ Comments dated March 17, 2011**

Dear Tom:

The purpose of this letter is to provide the Oregon Department of Environmental Quality (DEQ) with a response to comments received in a letter dated March 17, 2011 on the above referenced report. DEQ comments and the Port's responses are presented below.

DEQ Comment 1: Section 7 The benzo(a)pyrene concentration in soil sample location S-11 exceeded established remedial action objectives, yet it was not included as a remedial action area. Either add this location as a remedial action area or provide justification to exclude it.

Response: Location S-11 was intentionally excluded from the remedial action areas. In general, any sample with concentrations exceeding RBCs was included within the remedial action areas. However, for situations where a sample exceeded the RBC by less than 1.5 times (and thus the risk ratio to the nearest single significant digit is one) and that sample is surrounded by samples below the RBC, the area represented by that sample was not included within the remedial action area. This is consistent with risk assessment guidance where risk estimates are rounded to a single significant digit. This situation applies to sample S-11 because the risk ratio is 1.1 and the six nearest samples surrounding S-11 have risk ratios ranging from 0.03 to 0.6. Additionally, when considering any reasonable exposure area, the actual exposure point concentration represented by the single exceeding sample combined with the surrounding samples will be less than the RBC (e.g., in the extreme case of just S-11 and the six surrounding samples, the exposure point concentration is 180 µg/kg compared to the RBC of 270 µg/kg). This conclusion is verified by the acceptable residual risk calculations discussed in Section 11.2 of the FS.

DEQ Comment 2: Section 7 It is inappropriate to state that the cesspool area is “already capped,” thus implying that a remedy has been selected for this area. Remedial alternatives should be identified and evaluated for the subsurface cesspool soil to provide a means for remedy selection. Typical remedial alternatives for contaminated subsurface soil with clean overburden include: institutional controls, in situ treatment, and excavation with treatment or disposal.

Response: To clarify, the text does not indicate that the cesspool area is “already capped.” Rather, the text states that “the clean overburden is acting as a cap.” Because the cesspool area is essentially independent of the other areas, it can be evaluated separately. To justify that the clean overburden is a suitable cap for that area, a subsection in Section 7 will be included that identifies and evaluates potential alternatives for that area in a revised Upland Feasibility Study (FS) report. Each of the alternatives identified in Section 8 will include the selected remedy for the cesspool area.

DEQ Comment 3: Section 7 As described in Section 4.4, capping Wheeler Bay bank soil was selected and implemented as an interim source control measure. The FS should justify and recommend the implemented cap as the final remedy, rather than “carrying it through” the FS for each remedial alternative.

Response: A *Source Control Alternatives Evaluation* (dated February 22, 2007) was completed for the Wheeler Bay bank. That evaluation was completed consistent with the requirements of an FS and justifies selection of the capping remedy for the bank. A reference to the *Source Control Alternatives Evaluation* will be added to Section 7 documenting selection of the capping remedy for the bank. Each of the alternatives identified in Section 8 will include the selected remedy for the Wheeler Bay bank.

DEQ Comment 4: Section 9.3. Protectiveness Capping requires long-term monitoring and potential repair to assure integrity of the cap.

Response: The reference to monitoring in this case was intended to address sampling and analysis. Inspection and repair were included under operation and maintenance. The text will be revised to improve clarity.

DEQ Comment 5: Table 3 Alternative D should read “Excavation and Disposal,” rather than “Deep Capping.”

Response: Table 3 will be revised.

The FS will be revised in accordance with the above responses to DEQ comments once DEQ approves these responses. Please call me at (503) 415-6676 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Kelly Madalinski". The signature is fluid and cursive, with the first name "Kelly" and last name "Madalinski" clearly distinguishable.

Kelly Madalinski
Environmental Project Manager

c: Kristine Koch, EPA
Dennis Klein, Cargill Inc.
Colleen Knapp, Cargill Inc.
Kimberly Thorstad (Cargill)
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